

Name of Witness: CHRIS HUNT  
Statement number: 1  
Exhibits: CH1-CH6  
Date: 20 January, 2020

**IN THE MATTER OF  
THE GRENFELL TOWER INQUIRY**

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**WITNESS STATEMENT OF CHRIS HUNT**

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**I, CHRIS HUNT, DO STATE AS FOLLOWS:**

1. I make this witness statement in response to the request for evidence pursuant to a Notice served upon me under Section 21(2) of the Inquiries Act 2005.
2. The matters referred to in this witness statement are within my own knowledge, except where I have indicated otherwise. Where any matters contained in this witness statement are not within my own knowledge, they are true to the best of my knowledge information and belief.
3. I have been shown documentation by the BBA in order to allow me to answer the request for evidence and to assist my memory where possible. I attach to the statement as Exhibits CH1-CH6 the complete bundle for the sake of completeness.

*Your background and experience*

1. **Please provide a summary of your own professional experience and training with regard to the assessment, testing and certification of construction products and materials. Please include a brief history of your career at the BBA, giving details of job titles, the remit and responsibilities of each role and the dates during which you carried out each role.**

<b>Qualification/Training</b>	<b>Institution/Provider</b>	<b>Year Completed</b>
BSc (Hons) Physics and Acoustics	University of Surrey	1985
Associate of the University of Surrey	University of Surrey	1986
BBA internal training, including management and marketing modules, etc.	BBA bespoke training - Capita	2006 - 2014
CIM training	Product Development and Product Management	2009 - 2011
Stakeholder Engagement	Chartered Institute of Public Relations	2014
ISO 9001 Internal Auditing	ISOQAR	2012

4. Research Assistant | MoD, Royal Armaments Research & Development Establishment, Sevenoaks 1983 – 1984

- Carried out research projects using infrared spectroscopy and reported original research on infrared pyrotechnic countermeasures based on laboratory and field trial measurements.

5. Project Manager/Product Assessor | British Board of Agrément (BBA), Garston 1986 – 1989

- Performed assessment, testing, factory production control and evaluation of construction products, with a focus on windows, doors, cladding and curtain walling, heating, plumbing and drainage products.
- Learnt the assessment, certification, inspection and testing functions.
- Promoted to Section Head.

6. Section Head | British Board of Agrément (BBA), Garston 1989 – 2007  
Management of a team of four Product Assessors and technical lead on windows, doors and hardware products.

- Managed the windows and doors certification business.
- Developed the approval of conservatory systems.
- Liaison with the window industry leading to the BBA becoming the inspection provider for the FENSA Competent Person Scheme.

- Contributed to the creation of security standards for windows and doors and the steering committee for the introduction of window energy rating in the UK (BFRC).
7. Head of Approvals | British Board of Agrément (BBA), Garston 2007 – 2010  
 Management of an Approvals team of 12 Project Managers and Technical Authors responsible for product certification, including Agrément and ETAs, of windows, doors, insulation, ventilation and other building fabric products.
- Responsible for contract review, assignment of work, test and assessment method development, certification decisions and audit of project files.
  - Integration of two existing sector approvals teams into a new unified business unit.
8. Development Project Manager | British Board of Agrément (BBA), Garston 2010 – 2013
9. Corporate Development Manager | British Board of Agrément (BBA), Garston 2013 – 2015
- Management and development of external stakeholder and partnership activity, product and technical development projects, external representation, consultation responses, sustainability and environmental projects, and internal auditing.
10. I was subsequently made redundant in December 2015 and gained employment at the BRE – (see answer to question 98 below).

2. **What training did the BBA provide to staff involved (other than in a purely administrative capacity) in the certification of insulation products and of K15 in particular? Please give details in outline of all relevant training provided with specific focus on any training related (but not limited) to:**

- a. **The requirements of the Building Regulations and the interpretation of relevant sections of the associated guidance, including the Approved Documents;**

11. There was no formal training when I first joined in 1986. However, my knowledge of the Building Regulations developed over time and within my role.

- b. **The requirements of the Building Regulations for the use of combustible materials in buildings with a floor above 18 meters;**

12. See my answer to question 2(a) above. Prior to my role as the Head of Approvals my knowledge on combustible materials would have been limited. However, I invariably had access to a wealth of knowledge at my disposal from the Technical Manager and a support structure at the BBA around me. I had ad-hoc training related to specific projects by other members of staff with relevant knowledge and experience. I had no previous training or specific experience of insulation products.

- c. **Fire testing and the related classification of building products and materials;**

13. See answer to question 2(b) above.

- d. **The BS 8414 test method for external cladding systems;**

14. See answer to question 2(b) above.

- e. **The criteria in BR 135.**

15. See answer to question 2(b) above.

- 3. **When a certificate is issued by the BBA, who should provide the wording for the content, either for the front sheet or for particular technical sections such as “Behaviour in relation to fire”?**

16. I have no knowledge of current processes at BBA. At the time I was involved, certificates were drafted by Product Assessors (latterly named Project Managers) based on similar product certificates when possible (templates called ‘leaders’).

Wording may also have been contributed by internal or external experts on specific performance aspects as required. A BBA Technical Writer would also be involved.

**4. In terms of the wording of final, issued certificates:**

- a. Who, by reference to individuals and/or by reference to job titles, checks the wording, the overall meaning and the potential manner in which each section will be understood or interpreted?**

17. From my recollection at the time it was internal and external commentators to which drafts had been circulated, generally including the Approvals Manager, Technical Manager, BBA Technical Writers, the client and finally the Chief Executive.

- b. How are these checks carried out?**

18. Draft certificates were circulated, and comments reviewed and addressed as necessary.

- c. Who has responsibility for the wording of the issued certificates?**

19. The BBA as an organisation.

**5. In terms of the veracity and/or accuracy of test results cited within a BBA certificate:**

- a. Who, by reference to individuals and/or by reference to job titles, checks the wording, the overall meaning and the potential manner in which each section will be understood or interpreted?**

20. At the time this was by the Product Assessor, Technical Writer, Approvals Manager, Technical Manager (where requested), the manufacturer and internal and external commentators if applicable.

- b. How are these checks carried out?**

21. By draft certificate circulation to the then current BBA procedures.

c. **Who has responsibility for the veracity and/or accuracy of the tests results cited within a certificate?**

22. Data was either internal BBA test data or UKAS accredited, or subject to checking in accordance with the then current BBA procedure.

6. **What do you understand to be the likely effect for a manufacturer of obtaining BBA certification in relation to any particular product?**

23. I would imagine that it may assist with marketing the product, promotion to specifiers and as an aid to demonstrating compliance with requirements and regulations.

7. **What is your own understanding as to how, from 2008 onwards, BBA certification of any particular product may have affected the standing of the product within the market?**

24. It would depend on the product sector, but it may have increased the use of a product in the market.

8. **What is generally the purpose, as you understand it, in a manufacturer seeking BBA certification of any particular product?**

25. This is a question for a manufacturer; however, I imagine there are marketing advantages and acceptance of new products in the market.

9. **In 2008, what checks would and/or should have been carried out by the BBA to ensure that all relevant information was provided to the BBA prior to the issue of any certificate?**

26. This would generally be based on reviewing the contract requirements and a request to provide the relevant information. The client signs the contract to confirm they will provide any specific relevant information.
- 10. Please describe your own knowledge of and any part in the BBA's relationship with the Building Research Establishment (hereafter "the BRE") during your period of employment at the BBA.**
27. As a technical consultant where the BBA did not have the relevant in-house expertise and as an additional source of expertise and testing in specific performance aspects e.g. environmental, thermal, wind / snow loading and fire.
- 11. Please describe your own knowledge of and part you played in the BBA's working relationship with Kingspan as at October 2008.**
28. As an Approvals Manager, there would have been some contact by 'phone and at meetings, but most day-to-day contact would have been via the Product Assessors working on specific projects for Kingspan. I have not been provided with any documentation that indicates anything more specific.
- 12. In 2008, how many Kingspan products held a valid BBA Certificate?**
29. I don't know.
- 13. What UKAS accreditation applies or applied to each of the five certificates issued (see table below) by the BBA for Kingspan's Kooltherm K15 (hereafter "K15")?**

08/4582	Issue 1	27 October 2008
08/4582	Amended Issue 1	6 April 2010
08/4582	Issue 2	17 December 2013
14/5134	Issue 1	08 October 2015
14/5134	Amended Issue 1	16 November 2015

30. I don't remember.
14. **As far as you were aware, when did Kingspan first contact the BBA in relation to the potential certification by the BBA of K15?**
31. I don't remember but have been shown an email dated 23 October 2003 which would appear to indicate the first contact [CH1].
15. **What was the BBA's understanding as to the use to which K15 would be put within an external cladding system? If different, what was your own understanding?**
32. In respect of the BBA's understanding I do not know. However, I have seen copies of the Contract and Assessment Specification [CH2] which state '*phenolic insulation board for use with rainscreen cladding systems*' and 'for use as an insulation behind rainscreen cladding systems on masonry walls' respectively
16. **What sections of the Building Regulations and/or the guidance in Approved Document B do you consider would apply to K15?**
33. I have no current involvement with Approved Document B and therefore am not in a position to answer this question.
17. **In relation to large-scale testing to BS 8414 of external cladding systems, and covering the entire period of your employment at the BBA, what was your own**

**understanding as to how any unsuccessful tests would be recorded, either by the BRE and/or by the test sponsor?**

34. I would not have had knowledge as to how other third-party organisations recorded this information.

**18. What was the BBA's policy in relation to requesting records as to unsuccessful tests from Certificate holders or potential Certificate holders? Please also explain the reasoning behind any relevant policy.**

35. I don't recall any such policy, but it is down to the Certificate holder / applicant to provide such information to the BBA.

**19. What inquiries were made of the BRE at any stage as to testing to BS 8414 carried out on systems incorporating K15?**

36. I do not know and I have seen no written correspondence on this.

**20. Please set out your own understanding of the meaning of "Class 0". How did you understand this classification in relation to K15? In what way is this classification relevant to K15, if at all?**

37. I remember it as a designation for surface spread of flame in Approved Document B, but I have no current involvement with Approved Document B. I don't remember the direct relevance to K15.

**21. What did you understand the phrase "low risk" to mean?**

38. I don't remember.

**22. What was your own understanding of the meaning of the phrase "limited combustibility"?**

39. I recall it was related to a definition in Approved Document B.

**23. In 2008, what relationship did you understand classifications pursuant to testing to BS 476-6 and/or BS 476-7 to bear to whether or not a product could be categorised as a product "of limited combustibility"?**

40. I don't remember.

**For all of the matters covered at q 15-23 above, if your understanding has changed at any time, please explain when and how any such change in understanding came about.**

*Certificate 08/4582 Issue 1*

24. **The Inquiry is in receipt of a letter from the BBA dated 18 April 2019, a copy of which is attached for your reference. The letter informs the Inquiry that in order to demonstrate a product's classification to Class 0, "test reports to BS 476-6 and BS 476-7 are required and no such reports are contained on any of the K15 file folders".**

a. **What do you understand to be meant by this?**

41. That no reports were found on the available files for K15.

b. **Do you agree with this statement?**

42. I can only rely on the file contents because I can't recall any further details.

c. **Was Kingspan asked by the BBA whether K15 had been tested to BS 476-6 and BS 476-7? If not, why not?**

43. I don't remember; however, I have seen letters dated 7 September 2004 and 2 December 2004 [CH3] and the contents are self-explanatory where reaction to fire testing was requested.

d. **If so, when? What was the response?**

44. I don't know.

e. **At the time of the issue of 08/4582 Issue 1, did the BBA understand K15 never to have been tested to BS 476-6 or BS 476-7?**

45. See answer to question 24 (c) above.

- f. **What evidence did the BBA possess or see prior to 27 October 2008 which would or could lead to an assertion that K15 was a product which could be described as Class 0?**

46. I don't remember; however, I have inspected technical literature dated May 2007 [CH4] provided to me by the BBA and note on the front page that it describes it as Class 0 and this is also mentioned at page 6 of the same document.

- g. **Is it correct that the product was stated in the certificate to have achieved Class 0 on the basis of an extrapolation from other products, as described in the BBA's letter of 18 April 2019?**

47. I don't know.

- h. **On what basis did you or any other employee or agent of the BBA consider it appropriate for the BBA to "extrapolate" in the manner "instead" of requiring the relevant test reports?**

48. I don't know.

- i. **On what basis did you consider that the BBA was entitled to describe as class 0 as product which had not, to the BBA's knowledge, achieved that classification?**

49. I don't know.

- j. **Please explain, with reference to the documents, how the extrapolation from test results on similar phenolic products was calculated in order to arrive at the purported Class 0 classification. Who carried out this exercise? On what basis? Please also explain who was responsible for authorising this decision.**

50. I don't know.

25. **The Inquiry also understands, from the BBA's letter of 18 April 2019, that no initial assessment of the manufacture of the product took place and that this**

appears to have been on the basis that Kingspan's quality standards were, in the view of the BBA, well established.

a. **Is this correct, in your view? If not, please explain.**

51. I note that there was no initial factory inspection but this in isolation would not have concerned me.

b. **Who authorised this decision?**

52. Sonia Marshall, the Section Head at the time of programming the contract.

c. **Is this normal practice? If not, why not?**

53. I believe so. At the time the manufacturer was already subject to BBA surveillance for related products.

d. **Were you personally aware that no initial assessment had taken place?**

54. Yes.

e. **Did you and/or do you now consider this to represent good practice?**

55. Yes, if satisfactory surveillance was considered to be established for similar products at that location.

f. **Should the certificate make clear that no initial assessment of the manufacture of the product has taken place? If not, why not?**

56. I don't believe so; particularly if surveillance was already established for that specific manufacturer at that location for related products.

g. **If so, please assist as to the way in which the certificate makes this clear, quoting the relevant sections wherever necessary.**

57. See answer to 25 (f) above.

26. **In relation to the following statement "*the boards will not contribute to the development stages of a fire*" (found at page 1 of the Certificate):**

a. **Who provided this wording?**

58. I don't know.

b. **Who checked and/or authorised the inclusion of this wording?**

59. I have had sight of the certificate traveller log [CH5] and the individuals names are present.

c. **What is the statement intended to mean?**

60. I don't know but I would refer to my answer to question 26(e) below.

d. **What do you consider to be the likely effect of this statement on those reading the Certificate?**

61. I don't know but I would refer to my answer to question 26 (e) below.

e. **What is the evidential basis for the statement? Please give full details of all and any material relied on to make this assertion and provide references, where necessary, to any relevant test or standard.**

62. I don't remember, but I recall the page 1 content was intended as a summary from the sections within the body of the certificate. The summary directs the reader to section 7, where full details are given.

f. **Who provided the wording for Section 7?**

63. The Product Assessor would have drafted the initial draft but I refer to traveller log exhibited above.

g. **Who was responsible for checking the wording of Section 7 prior to the issue of the certificate?**

64. Those listed in my answer to 26 (b) above.

27. **Section 7.1 contains, in relation to a test to BS 8424-1 on a system incorporating K15, the following words "therefore displaying limited fire spread away from the fire source and that the product meets the criteria stated within BRE 135.**

- a. **Has the BBA at any stage been an organisation accredited by UKAS or any other accrediting body to classify BA 8414 test data to BR 135? If so, under what certificate or technical specification? Please provide full details. Please also refer to any supporting documentation, if previously provided. If supporting documents have not been provided previously, please exhibit them to your statement.**

65. I don't know.

- b. **If not, was a Br 135 Classification Report sought by the BBA from Kingspan in respect of the test to BS 8414-1:2002 referred to at Section 7.1? If not, why not?**

66. I don't know and I have not seen any evidence on file.

- c. **If one was sought, when? Was a BR 135 Classification Report ever provided?**

67. I don't know and I have not seen any evidence on file.

- d. **If not, what explanation did Kingspan give for being unable to so provide?**

68. I don't know and I have not seen any evidence on file.

- e. **Was any information in relation to any aspect of this test to BS 8414-1 sought by the BBA from the BRE?**

69. I don't know and I have not seen any evidence on file.

- f. **Was the BBA in possession of the full BS 8414 Test Report (220876), dated 8 December 2005? If not, why not? Had it been requested from Kingspan or from the BRE? If not, why not?**

70. Yes; it appears on the file I have inspected. It would have been normal practice to request this from Kingspan.

- g. Which component of the system tested did you, or the BBA, understand to constitute rainscreen cladding?**

71. I have inspected the BS 8414-1 report reference 220876 [CH6] and understand rainscreen cladding to constitute the cement particle boards and associated rails and fixings.

- h. Did you consider this test to be representative of any external cladding system used on buildings? If so, in what way?**

72. No, it was specific to the construction tested.

- i. On what basis did the BBA deem it acceptable and/or accurate to conclude and to state, in the absence of any Classification Report to BR 135, that the criteria therein had been met?**

73. I don't remember.

- j. Did you understand the information that the temperature at the level 2 thermocouples had not exceeded 600°C could, in and of itself, satisfy the BR 135 criteria?**

74. I don't remember.

- k. On what basis did the BBA deem it acceptable and/or accurate to conclude and to state that "the product" had met the criteria within BR135?**

75. I don't remember.

- l. Please explain the way in which you understand BR 135 to contain criteria capable of classifying a product.**

76. I don't remember.

- m. **Why is the date of the test to BS 8414-1 referred to not included in Section 7?**

77. I don't remember, but I don't believe dates of tests were generally referred to in BBA certificates at the time.

- n. **Did the BBA, prior to issuing the certificate, analyse the test data from the test referred to? If not, why not?**

78. I don't remember.

- o. **What, if any, other BS 8414 test data relating to systems incorporating K15 was sought from Kingspan by the BBA and/or considered prior to the issue of the certificate?**

79. I don't remember.

28. **In relation to the following wording at Section 7.2, "The product is classified as Class 0 or 'low risk' as defined in the documents supporting the national Building Regulations":**

- a. **What was the purpose of including this wording?**

80. I don't remember precisely but generally as information for users/specifiers.

- b. **What did you understand to be the meaning of this wording?**

81. I don't remember precisely but it may have been in relation to the fire classification of the products.

- c. **Please identify the "documents supporting" referred to in this section. Is this a reference to Approved Document B?**

82. I believe so and the other national building regulations guidance documents.

- d. **On the basis of what evidence and/or data were the words "is classified as Class 0" used?**

83. See answer to question 24 above.

- e. Was the phrase “low risk” included in order to satisfy the relevant provisions in Scotland? If not, what is the purpose of including this phrase? If so, on what evidential basis did the BBA consider that K15 could be classified as “low risk” in Scotland?

84. Perhaps, but I don't remember.

29. On what basis was it deemed appropriate to direct that the certificate holder/product manufacturer was to be contacted for advice with regards to use of the product in buildings with a floor more than 18m above ground level?

85. I believe because the site / project specific design considerations would need to be known in order to advise on feasibility. Additional fire data may be required for a specific construction that was not available at the time of issue of the Certificate.

30. What discussions did you or any other employee or agent of the BBA have as to what advice the manufacturer would subsequently give if approached? If none, why?

86. I don't recall any specific discussions.

31. Did you consider, at any stage, that this certificate had been issued in error or that it contained any material error or omission? If so, please describe the error or omission, that date on which it was identified, by whom it was identified and all actions taken once it was identified.

87. Not that I recall.

32. Did you have, at any stage, any concerns in relation to any part of the Certificate in relation to fire? As far as you were aware, did any other individuals (either internal or external) have any such concerns?

88. Not that I recall.

*08/4582 Amended Issue 1 – 6 April 2010*

**33. When was this issue published?**

89. I do not know when it was published.

**34. Who provided the wording for Section 7?**

90. I don't remember, but normally this would have been the Product Assessor, perhaps in consultation with others.

**35. Who was responsible for checking the wording of Section 7 prior to the issue of the certificate?**

91. This would have been normally the Approvals Manager, Technical Writers and the Certificate holder.

**36. This certificate contains, at Section 7.1, a new reference to paragraph 12.7 of Approved Document B Volume 2 (hereafter "12.7"), as follows, "*The product is classified as Class 0 or 'low risk' as defined in the documents supporting the national Building Regulations. The produce, therefore, may be used in accordance with the provisions of: England and Wales – Approved Document B paragraphs 12.5, 12.6 and 12.7, Volume 3 see also Diagram 40*".**

**a. Why was reference to paragraph 12.7 added to this section?**

92. I don't remember but it may have been in relation to masonry cavity wall construction.

**b. Who made the initial proposal that reference be made to the product satisfying paragraph 12.7? What discussion as to the inclusion of this new reference took place, either internally or with the manufacturer?**

93. I don't remember.

**c. Was the new reference to 12.7 included at the instigation or suggestion of an employee or agent of Kingspan?**

94. I don't remember.

- d. **As far as you were aware, what was Kingspan's view as to the inclusion of this new reference?**

95. I don't remember.

37. **Why was the following wording, from Issue 1, "therefore displaying limited fire spread away from the fire source and that the product meets the criteria stated within BRE 135" removed from this certificate?**

96. I don't remember.

38. **As far as you are aware, what was Kingspan's view on the removal of this section?**

97. I don't know.

39. **Without the purported classification to BR 135 which had been included in Issue 1, how was it envisaged that section 7.5 would assist any reader of the certificate? What is the purpose of its inclusion?**

98. I don't remember.

40. **At the time of issue of this certificate, had Kingspan been asked by the BBA for a BR 135 Classification Report in relation to the test to BS 8414 referred to? If not, why not? If so, what was the BBA's Understanding as to why no BR 135 Classification Report could be provided?**

99. I don't remember.

41. **Was any consideration given at this stage as to whether the system tested to BS 8414-1:2002 was in any way representative of any external cladding system which might be placed on a building? If so, by whom? Please provide details of all relevant matters considered.**

100. I don't remember.

42. **On what evidential basis, at this stage, were the words “*the product is classified as class 0 or ‘low risk’*” included?**

101. I don't remember.

*Issue 2 of 08/4582 17 December 2013*

43. **Who provided the wording for Section 8?**

102. I have no relevant knowledge from that time as I had changed role at the BBA.

44. **Who was responsible for checking the wording of Section 8 prior to the issue of the certificate?**

103. I have no relevant knowledge from that time as I had changed role at the BBA.

45. **Why was the reference (in Amended Issue 1) to satisfying 12.7 Approved Document B removed at this stage? Please explain, in as much detail as possible, how the removal of this reference came about. What discussions took place between the BBA and Kingspan prior to the issue of this certificate? Was reference made by an employee or agent of Kingspan to discussions between Kingspan and the National House Building Council (hereafter “the NHBC)?**

104. I have no relevant knowledge from that time as I had changed role at the BBA.

46. **Had this certificate been checked by an expert prior to issue? If so, please give details of the expert(s) and as to any advice received in respect of the certificate's content.**

105. I have no relevant knowledge from that time as I had changed role at the BBA.

47. **What awareness did you have as to the use to which K15 was being put by this stage, and how widely?**

106. I have no relevant knowledge from that time as I had changed role at the BBA.
48. **Did you consider it necessary for the BBA to have some knowledge as to the manner in and frequency with which K15 was being used before re-issuing a certificate for the product at this stage? If not, why not?**
107. I have no relevant knowledge from that time as I had changed role at the BBA.
49. **Why was the wording at Section 8.2 amended to read, “the following specific cladding construction met the criteria as stated in BRE 135”?**
108. I have no relevant knowledge from that time as I had changed role at the BBA.
50. **Had the BBA by this date sought from Kingspan or from the BRE a BR 135 Classification Report from Kingspan? If not, why not? If so, what was the response?**
109. I have no relevant knowledge from that time as I had changed role at the BBA.
51. **On what basis did the BBA purport to classify the test data from the 2005 test to Br 135?**
110. I have no relevant knowledge from that time as I had changed role at the BBA.
52. **What further BS 8414 test results on systems incorporating K15 had been provided to the BBA prior to the issue of this certificate? Had the BBA asked for any to be provided? If not, why not?**
111. I have no relevant knowledge from that time as I had changed role at the BBA.
53. **What was your own state of knowledge as to any further testing to BS 8414 carried out by Kingspan on systems incorporating K15 in the period 2008 – December 2013?**

112. I have no relevant knowledge from that time (save where mentioned earlier in my statement) as I had changed role at the BBA.
- 54. What knowledge, in your view, should the BBA have had prior to the issue of this certificate in relation to any further testing to BS 8414 carried out by Kingspan on systems incorporating K15 in the period 2008 – December 2013?**
113. I have no relevant knowledge from that time (save where mentioned earlier in my statement) as I had changed role at the BBA.
- 55. Why was the content contained in footnote 1 added to section 8.2 at this stage?**
114. I have no relevant knowledge from that time as I had changed role at the BBA.
- 56. Why was the direction that the certificate holder/product manufacturer was to be contacted for advice with regards to use of the product in buildings with a floor more than 18m above ground level removed?**
115. I have no relevant knowledge from that time as I had changed role at the BBA.
- 57. If the direction referred to in paragraph 55 was considered inappropriate for inclusion by this stage, please explain why. What steps, if any, did the BBA or any employee or agent of the BBA take to mitigate any errors which may have been made by reliance placed on the direction in previous certificates?**
116. I have no relevant knowledge from that time as I had changed role at the BBA.
- 58. As to section 8.3:**
- a. **Is the intended meaning that for buildings with a floor more than 18m above ground level, the product can be used, or that the “construction defined in 8.2” can be used?**

117. I have no relevant knowledge from that time as I had changed role at the BBA.
- b. **What do you consider the reader of the certificate would take it to mean?**
118. I have no relevant knowledge from that time as I had changed role at the BBA.
- c. **Do you consider the wording in this section to be clear and unambiguous? Did you consider it to be clear and unambiguous at the time of issue?**
119. I have no relevant knowledge from that time as I had changed role at the BBA.
59. **By this stage, what evidence and/or test data did the BBA hold on which to base the assertion, in section 8.1, that “*the product is Class 0 or ‘low risk’*”?**
120. I have no relevant knowledge from that time as I had changed role at the BBA.
60. **In relation to both 14/5134 Issue 1 October 2015 and 14/5134 Issue 2 November 2015, please provide the following details, making clear to which issue any comments relate:**
61. **Who provided the wording for Section 8?**
121. I have no relevant knowledge from that time as I had changed role at the BBA.
62. **Who was responsible for checking the wording of Section 8 prior to the issue of the certificate?**
122. I have no relevant knowledge from that time as I had changed role at the BBA.
63. **Had this certificate been checked by an expert prior to issue? If so, please give details of the experts) and as to any advice received in respect of the certificate’s content.**

123. I have no relevant knowledge from that time as I had changed role at the BBA.
64. **Please explain the reason for all alterations to section 8 at this stage.**
124. I have no relevant knowledge from that time as I had changed role at the BBA.
65. **Had the BBA by the date of issue sought from Kingspan or from the BRE a BR 135 Classification Report in relation to the 2005 test to BS 8414-1:2002? If not, why not? If so, what was the response?**
125. I have no relevant knowledge from that time as I had changed role at the BBA.
66. **On what basis did the BBA purport to classify the test data from the 2005 test to BR 135, at this stage?**
126. I have no relevant knowledge from that time as I had changed role at the BBA.
67. **What BS 8414 test data on systems incorporating K15 had been provided to the BBA prior to the issue of this certificate other than those cited? Had the BBA asked for any to be provided? If not, why not?**
127. I have no relevant knowledge from that time as I had changed role at the BBA.
68. **What was your own state of knowledge as to any unsuccessful testing to BS 8414 carried out by Kingspan on systems incorporating K15 in the period 2008 – November 2015? What steps were taken by you or any other employee or agent of the BBA to become informed as to any relevant unsuccessful tests to BS 8414?**
128. I have no relevant knowledge from that time as I had changed role at the BBA.
69. **By this stage, what evidence and/or test data did the BBA hold on which to base the assertion, in section 8.1, that “*the product is Class 0 or ‘low risk’*”?**

129. I have no relevant knowledge from that time as I had changed role at the BBA.
70. In relation to 14/5134 Issue 2 November 2015 only:
71. Why was the purported classification of the product as Class 0 or 'low risk' removed from this certificate?
130. I have no relevant knowledge from that time as I had changed role at the BBA.
72. For all the BBA certificates for K15 save for the first, 08/4582 Issue 1, please provide the following information, separately, in respect of each:
- a. Was the BBA in possession of the full BRE BS 8414-1:2002 Test Report (220876), dated 8 December 2005?
131. I don't know.
- b. If not, why not? Had the full Test Report been requested from Kingspan or from the BRE?
132. I don't know.
- c. If so, please give details as to any consideration given by the BBA to the following advice, given at page 4 of 16 of the BRE Test Report (Introduction), "*it is recommended that the relevance of test reports over 5 years old should be considered by the user. The laboratory that issued the report will be able to offer, on behalf of the legal owner, a review of the procedures adopted for a particular test to ensure that they are consistent with current practices, and if required may endorse the test report*".
133. I have no relevant knowledge from that time as I had changed role at the BBA.
- d. Did you or any other employee or agent of the BBA, contact the BRE to request a review of the procedures or an endorsement of the test report? If not, why not?

134. I have no relevant knowledge from that time as I had changed role at the BBA.

- e. **How did the BBA, in April 2010, December 2013, October 2015 and November 2015 satisfy itself that the test methods adopted in the 2005 test referred to in the respective certificates were consistent with current practice?**

135. I don't remember from April 2010. I have no relevant knowledge subsequent to that time as I had changed role at the BBA.

73. **The Inquiry is aware that the BBA received, on 11 July 2014, an email from Brian Martin of the Department for Communities and Local Government (hereafter "DCLG") in respect of Amended Issue 1 of Certificate 08/4582 to K15 as a product which satisfies paragraph 12.7 of Volume 2 of Approved Document B.**

74. **In the initial email of 11 July 2014, Mr Martin sets out concerns as to the reference included in Amended Issue 1 of Certificate 08/4582 to K15 as a product which satisfies paragraph 12.7 of Volume 2 of Approved Document B.**

75. **At any stage *prior* to 11 July 2014:**

- f. **Were you aware of any general concerns or issues in relation to the use of K15 (or any other combustible material) on buildings with a floor above 18m? If so, please describe your knowledge and understanding of any such issues, explaining how and when they came to your attention.**

136. I have no relevant knowledge from that time as I had changed role at the BBA.

- g. **Had you or any other employee or agent of the BBA had any contact with any employee or agent of the NHBC in relation to any aspect of K15? If so, please set out in detail the nature of that communication including full details of all matters discussed, the dates and the individuals involved.**

137. I have no relevant knowledge from that time as I had changed role at the BBA.
76. **Were you previously aware of the email referred to at paragraph 73 above?**
138. I remember being informed it had been received and replied to at the time.
77. **If so:**
- a. **When were you made aware of the email and/or the nature of its content?**
139. At the time of the reply, I think.
- b. **By whom?**
140. The Technical Manager.
- c. **What discussions, if any, did you have with any employee or ex-employee of the BBA in respect of it? Please list those with whom you consulted and describe the nature of any relevant discussions.**
141. I don't recall any such discussions.
- d. **Were you asked to contribute to the content of the reply, sent on 16 July 2014, and also attached for your reference?**
142. I don't believe so.
- e. **Do you agree with the content of the reply? If not, please identify any section where your own opinion or knowledge differs from the information given to MHCLG, explaining how and why.**
143. Yes, generally. I have no further knowledge to contribute from that time as I had changed role at the BBA.
78. **As far as you were aware, was the email from Brian Martin discussed by the BBA with any employee or agent of the NHBC?**

144. I don't know.

79. Did you or, as far as you are aware, any other employee or ex-employee of the BBA discuss the email from Brian Martin or the BBA's response to it with any employee or agent of Kingspan? If so, please describe any such discussions in detail, including the names of all individuals involved and giving dates.

145. Not that I'm aware of.

80. The Inquiry understands that in the BBA's emails to Brian Martin of 16 and 23 July 2014, it was stated (in summary) that:

- a. The reference to satisfying 12.7 was not intended to imply that the product was of limited combustibility;
- b. The reference was an unfortunate oversight, based on human error;
- c. As of 23 July 2014, neither the project manager nor his/her line manager who had been responsible for the certificate's content were still working in the BBA's Operations Department;
- d. New training structures and an additional level of checking had been introduced;
- e. Greater reliance had been placed on certificate templates.

81. In your view, was the information provided to Brian Martin on 16 and 23 July 2014 wholly correct? If not, please set out what the correct position was.

146. I have no relevant knowledge from that time as I had changed role at the BBA.

82. Were you consulted at any stage in relation to these emails? If so, by whom and in what regard?

147. I don't believe so as I had changed role at the BBA.

Were you alerted at any time to the fact that this was considered by the BBA to be an "oversight"? If so, how, when and by whom? Do you agree with that description?

148. I have no relevant knowledge from that time as I had changed role at the BBA.
83. **As far as you are aware, what internal investigations and inquiries took place as to the “oversight” described? When did any such investigations first begin?**
149. I have no relevant knowledge from that time as I had changed role at the BBA.
84. **When did any such investigations conclude?**
150. I have no relevant knowledge from that time as I had changed role at the BBA.
85. **Do you agree with the characterisation of this matter having occurred as a result of “human error”? If not, why not?**
151. The ‘human error’ aspect is not further elaborated, and I have no relevant knowledge from that time as I had changed role at the BBA.
86. **Please give details of the evolution of the wording of the certificate, the input from all individuals as to the content regarding paragraph 12.7, the checks in place at the time and the way in which the error described was found to have occurred.**
152. I have no relevant knowledge from that time as I had changed role at the BBA.
87. **What was the result of any internal investigation? What action was subsequently taken, if any?**
153. I have no relevant knowledge from that time as I had changed role at the BBA.
88. **When was Kingspan notified of the error? By whom?**
154. I have no relevant knowledge from that time as I had changed role at the BBA.
89. **What was Kingspan’s reaction?**

155. I have no relevant knowledge from that time as I had changed role at the BBA.
90. **Please name the Project Manager and Line Manager referred to in the email of 16 July 2014. Were those two individuals still employed by the BBA on 16 July 2014? If so, in what roles?**
156. Myself as Corporate Development Manager and George Lee (I believe he had left by this time).
91. **Please describe the new training programme for all staff described in the email of 23 July 2014. When was this introduced?**
157. I have no relevant knowledge from that time as I had changed role at the BBA.
92. **Please explain the additional checking level referred to in the email of 23 July 2014. When was this introduced?**
158. I have no relevant knowledge from that time as I had changed role at the BBA.
93. **What was the new referend in Amended Issue 1 to 12.7 of Approved Document B intended to do, if not to imply limited combustibility?**
159. I have no relevant knowledge from that time as I had changed role at the BBA, but it may have been related to masonry cavity wall construction.
94. **Do you agree with the statement in the email of 23 July 2014 to Brian Martin that “the changes of anyone inferring limited combustibility” from the certificate wording was “unlikely”? If so, on what basis? What other meaning could the wording used in relation to “satisfying the requirements of paragraph 12.7” have, in your view?**
160. I have no relevant knowledge from that time as I had changed role at the BBA.
95. **Did you at any time in the period 2008 – 2017 (or are you aware of any other employee or agent of the BBA doing so), correspond with any of the following:**

- (a) Any official from the Building Regulations Division of DCLG;
- (b) Any employee or agent of the BRE; and/or
- (c) Any expert or member of any technical committee of the British Standards Institute.

In relation to any of the following matters:

- (a) The BBA's certification process in general;
- (b) The BBA's certification of K15;
- (c) The meaning and/or application of "Class 0" in general; and/or
- (d) The suitability in general of combustible materials for use in buildings over 18m in height.

If so, please provide full details, including names of any relevant individuals, dates and the nature of this correspondence.

161. To the best of my knowledge, not in relation to K15 other than the e-mail referred to in paragraph 73 and the subsequent replies referred to.
96. Aside from surveillance/audits, please set out your own recollection of any meetings between the BBA and Kingspan which related in any way to K15 and your own views as to the nature of the relationship between Kingspan over the period 2008 – 2017.
162. I don't remember.
97. On what date did your employment at the BBA terminate?
163. On or around 31 October 2015.
98. What were the circumstances of the termination of your employment at the BBA?

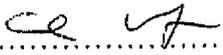
164. Redundancy.

99. What roles have you been employed in since joining the BRE? Please provide a brief summary of the remit and responsibilities of each role, in particular in relation to any aspect of fire safety.

165. Since joining BRE (December 2015) I've been employed as a Senior Certification Project Manager in the Physical Security team, working within the Electronics, Security and Inspections Division of BRE Global. Remit and responsibilities include testing, assessment and certification of physical security products and systems to various security standards including Loss Prevention standards (LPS), British, European and international standards. I have no remit or responsibilities in relation to fire safety.

**STATEMENT OF TRUTH**

I believe the facts stated in this witness statement to be true.

Signed.....  .....

**Mr Chris Hunt**

Dated this 20<sup>th</sup> day of January 2020